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**UNITED STATES DISTRICT COURT**

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**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

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RUMBLE, INC.,

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Plaintiff,

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v.

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THE DAILY MAIL AND GENERAL  
TRUST PLC and its subsidiary  
16 ASSOCIATED NEWSPAPERS LTD  
dba THE DAILY MAIL,  
17 DAILYMAIL.COM and  
MAILONLINE, et al.,

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Defendants.

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Case No. 2:17-cv-04977 PSG (SKx)

**DECLARATION OF ROBERT W.  
DICKERSON IN SUPPORT OF  
PLAINTIFF RUMBLE, INC.'S  
OPPOSITION TO MOTION TO  
DISMISS AMENDED COMPLAINT,  
IN PART, AND TO TRANSFER  
VENUE**

[Filed Concurrently with Opposition to  
Motion to Dismiss Amended  
Complaint, In Part, and to Transfer  
Venue; Declaration of Chris Pavlovski,  
and [Proposed] Order]

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Date: January 22, 2018

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Time: 1:30 p.m.

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Crtrm.: 6A

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1 I, Robert W. Dickerson, declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am a  
3 partner with Zuber Lawler & Del Duca LLP, attorneys of record for Plaintiff,  
4 Rumble, Inc. I have personal knowledge of the facts stated herein, except as to  
5 those stated on information and belief and, as to those, I am informed and believe  
6 them to be true. If called as a witness, I could and would competently testify to the  
7 matters stated herein.

8 2. I am informed and believe that Defendant has an office in Los Angeles,  
9 and has had one here continuously since July 2010. *See* Exhibit A attached (a true  
10 and correct copy of a December 18, 2014 DailyMail.com Press Release which states  
11 “MailOnline originally launched in the United States in July 2010 with its first  
12 newsroom in Los Angeles.”)<sup>1</sup>, and Exhibit B (a true and correct copy of the  
13 DailyMail careers website as of December 28, 2017, which states “With newsrooms  
14 in New York and Los Angeles, ...”).<sup>2</sup>

15 3. Defendant aggressively and specifically targets viewers in California,  
16 and in particular Southern California, and also uses articles about Los Angeles, its  
17 tourist attractions, and its inhabitants to attract viewers. *See* Exhibit C attached (a  
18 true and correct copy of a few pages from the DailyMail.com website on  
19 December 28, 2017, entitled “DailyMail.com Los Angeles”).<sup>3</sup> These pages are  
20 devoted to Los Angeles as a destination, and include numerous articles about things  
21 to do and see in Los Angeles.

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25 <sup>1</sup> Available online at <https://www.prnewswire.com/news-releases/dailymailcom-launches-in-america-300012077.html>.

26 <sup>2</sup> Available online on at <http://www.dailymailcareers.com>.

27 <sup>3</sup> These specific pages were available on December 28, 2017 online at  
28 <http://www.dailymail.co.uk/travel/destinationshub/los-angeles.html>.

